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15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 LOS ANGELES WATERKEEPER, a
18 California non-profit association,

19 Plaintiff,
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21 v.

22 KELTERITE CORPORATION, a
23 California corporation; KELTERITE
COMPANY, LLC, a California
24 corporation,
25

26 Defendants.
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Case No.: 2:24-cv-02130 - DSF (KESx)

NOTICE OF TENTATIVE

SETTLEMENT

1 PLEASE TAKE NOTICE that the parties have reached a tentative
2 settlement in this proceeding. Their agreement is reflected in the fully
3 executed proposed Consent Decree attached to this notice as “Exhibit 1,” a copy
4 of which has been sent to the United States Department of Justice (“DOJ”) and
5 the United States Environmental Protection Agency (“EPA”) for a 45-day review
6 period as required under section 135.5 of Title 40 of the Code of Federal Regulations.
7 Plaintiff will provide the Court with the written notice of commencement of the 45-
8 day review period once Plaintiff receives that notice from DOJ. At the end of the
9 45-day review period, Plaintiff will notify the Court of any objections received
10 from the reviewing agencies and will submit the proposed Consent Decree for
11 consideration and approval by this Court. Should the Court require any additional
12 information, the undersigned will be pleased to provide it upon request. Should the
13 Court require any additional information, the undersigned will be pleased to
14 provide it upon request.

15 Dated: June 25, 2024

Respectfully submitted,

17 /s/ J. Thomas Brett

18 Jason R. Flanders

19 J. Thomas Brett

AQUA TERRA AERIS LAW GROUP

20 Attorneys for Plaintiff

21 LOS ANGELES WATERKEEPER
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